

Exhibit A

FEDERAL
DEFENDERS
OF
SAN DIEGO,
INC.

The Federal Community
Defender Organization
for the Southern
District of California

April 2, 2008

Via U.S. Mail, Facsimile & E-Mail

Rebecca Kanter
Assistant United States Attorney
880 Front Street
San Diego, CA 92101

Re: *United States v. Salazar-Sandoval*
Case No. 08cr0285-H

Dear Ms. Kanter:

As you are aware, on March 27, 2008, we filed a motion pursuant to Rule 15 of the Federal Rules of Criminal Procedure seeking authorization to perform foreign depositions of witnesses that are material to the defense of Ms. Salazar-Sandoval's case. On April 1, 2008, I was informed that Judge Marilyn L. Huff would not grant an additional hearing date to resolve this issue, and that the motion could be heard at the time of *in limine* motions on April 7, 2008.

Pursuant to our conversation this morning, I am writing to formally inform you that pursuant to *United States v. Sanchez-Lima*, 161 F.3d 545 (9th Cir. 1998), we are going to take videotaped testimony from witnesses on Friday, April 4, 2008. Specifically, we will be taking statements from Reynoldo Medina and Maria Delores Sandoval-Perales. Ms. Sandoval-Perales has a medical condition that prevents her from traveling and therefore we will be conducting the depositions at an office of a notary public in Mexicali, Baja California, Mexico. As you are aware from the motion filed on March 27, 2008, both Mr. Sandoval-Perales and Mr. Medina are Mexican citizens who reside in Mexico, are not subject to the subpoena powers of the Court in this case, and consequently are not available to testify at Ms. Salazar-Sandoval's upcoming trial. Both of these witnesses will offer testimony regarding facts material to Ms. Salazar-Sandoval's defense and the evidence cannot be procured through any other means. *See Sanchez-Lima*, 161 F.3d at 547.

We would like to invite you to participate in the taking of the videotaped statements, so that you will have the opportunity to cross-examine the witnesses. We have scheduled the statements to begin at approximately 12 p.m., in Mexicali, Baja California, Mexico, at the office of a notary public in Mexicali, Baja California, Mexico. Federal Defenders will provide a court certified Spanish language interpreter as well as all of the videotaping equipment, as well as arranging for the notary to be present in order to swear the witnesses. Federal Defenders cannot be responsible for your safety during the trip.

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FEDERAL DEFENDERS OF SAN

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FAX TRANSMITTAL

DATE: April 2, 2008

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NUMBER OF PAGES: 3 (INCLUDING COVER SHEET)

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Comments: Please see attached letter.

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FEDERAL DEFENDERS OF SAN DIEGO, INC.

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